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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:

Policies and Rules
Concerning Children's
Television Programming
:
Revision of Programming
Policies for TV Broadcast
Stations

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MM Docket No. 93-48

COMMENTS OF ARTHUR D. SHEEKEY
President
Public Service Telecommunications Corporation

On behalf of the Public Service Telecommunications Corporation (PSTC), I would like to submit comments in support of the above-captioned petition for rulemaking on Children's Television Programming. PSTC is a not-for-profit educational organization which has been engaged in research, evaluation and technical assistance activities for the past two decades. Earlier, it's work had been carried out under the Public Service Satellite Corporation (PSSC).

PSTC would like to urge the Commission to adopt the strongest rule possible for assuring the availability of worthwhile educational

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and public information programming services. There is little doubt that the quantity and quality of children's programming services have declined over the past two decades while the number of channels and programming services have expanded.

Research and evaluation studies indicate the importance and potential of worthwhile educational television programs. Television has had an enormous effect on the behaviors and attitudes of viewers, particularly young viewers. There are many indications that for the foreseeable future television and related interactive media will play an even greater role in the lives of all Americans and in shaping the opinions of children. Much of what is presently offered over existing broadcasting networks and over cable television channels competes rather than complements the work of teachers and parents. Alternative programming services, which supplements the hours of school work are desperately needed. Moreover, educational programs directed to the growing needs of multi-cultural families must be recognized. If Hispanic youths, for example, will constitute more than twenty-five percent of the nation's school-age population (2050), new programming services designed to meet their unique needs should be identified and made available.

At this time, we are not recommending a specific regulatory approach for assuring the availability of children's broadcasting services. We believe the Commission has several workable options

from which to chose. We submit, however, a departure from the "Public Trustee Model" may be necessary. Provisions in the Communications Act of 1934 and subsequent requirements [(section 303b(a); 104 Stat. 997 (1990)] to impose and monitor educational programming standards have been unsatisfactory. We, therefore, urge the Commission to consider at least a near-term broadcasting solution based on spectrum fees. A long-term solution for the distribution of children's television programs and other educational services should include the full range of distribution mechanisms, i.e., cable television, wireless, direct broadcast satellite services and broadcasting. It would seem that within a period of three to five years, substantial developments in digital technologies, as well as an accelerated convergence of networks and services, will necessitate a further and comprehensive review of provisions incorporated in a Notice for Policies and Rules Concerning Educational and Children's Programming Services.

Finally, we would like to commend the Chairman and the other Commissioners for considering the condition of educational and children's television programming services. Within the present atmosphere for encouraging deregulatory incentives, we applaud the Commission for recognizing the public's stake in protecting children and to support the parents, guardians and teachers who assume the awesome burden to safeguard the interests of children and families.

Respectfully submitted,

By: _____

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